

Exhibit E

Hofman, Herman D.

From: Clayman, John <JClayman@fdlaw.com>
Sent: Monday, February 21, 2022 3:11 PM
To: Hofman, Herman D.
Cc: Caywood, Candace; Simms, Amber; Clayman, John
Subject: FW: BOKF/Ortiz v. Nelms (123.001) - Response to Subpoena

Good afternoon Herman:

Please see the e-mail string below. I look forward to your thoughts and comments on this issue.

John D. Clayman
Admitted in Oklahoma and Texas
FREDERIC DORWART, LAWYERS PLLC
Old City Hall
124 East Fourth Street
Tulsa, Oklahoma 74103
(918) 583-9965 (Direct Tel. No.)
(918) 583-9922 (General Office No.)
(918) 584-2729 (Facsimile No.)
(918) 606-2974 (Mobile No.)
jclayman@fdlaw.com
Legal Assistant: Candace Caywood, ccaywood@fdlaw.com

FREDERIC DORWART
LAWYERS PLLC

This message contains confidential information and is intended only for the individual(s) named. If you are not the named addressee, you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this e-mail by mistake and delete this e-mail from your system. E-mail transmission cannot be guaranteed to be secure or error-free as information could be intercepted, corrupted, lost, destroyed, arrive late or incomplete, or contain viruses.

From: Kevin Majewski <kmajewski@hspplc.com>
Sent: Monday, February 21, 2022 1:40 PM
To: Clayman, John <JClayman@fdlaw.com>
Cc: Caywood, Candace <CCaywood@fdlaw.com>; sdenenfeld@lewisreedallen.com; Eric Parzianello <eparzianello@hspplc.com>
Subject: RE: BOKF/Ortiz v. Nelms (123.001) - Response to Subpoena

John,

Mr. Nelms will not consent to the release of the records pursuant to the subpoena. Please let me know if you have any questions or concerns. Thanks.

KEVIN C. MAJEWSKI | ATTORNEY
HUBBARD SNITCHLER & PARZIANELLO PLC

MICHIGAN OFFICE
MAYFLOWER CENTRE
801 W. ANN ARBOR TRAIL
SUITE 240
PLYMOUTH, MI 48170

313.672.7300
734.233.9335 (Direct)

FLORIDA OFFICE
5/3 CENTER AT MERCATO
999 VANDERBILT BEACH RD.
SUITE 200
NAPLES, FL 34108
239.325.1802

Admitted in MICHIGAN

kmajewski@hspplc.com | www.hspplc.com



START A RESOLUTION

**CONFIDENTIALITY NOTICE:**

This message is confidential and may be privileged. If you received this in error, do not use or rely upon it. Please inform me by reply e-mail or call 313-672-7300 and then delete it.

From: Clayman, John <JClayman@fdlaw.com>

Sent: Wednesday, February 9, 2022 10:45 AM

To: Kevin Majewski <kmajewski@hspplc.com>

Cc: Caywood, Candace <CCaywood@fdlaw.com>; sdnenfeld@lewisreedallen.com; Eric Parzianello <eparzianello@hspplc.com>; Clayman, John <JClayman@fdlaw.com>

Subject: FW: BOKF/Ortiz v. Nelms (123.001) - Response to Subpoena

You don't often get email from jclayman@fdlaw.com. [Learn why this is important](#)

Good morning Kevin:

Hope you're doing well. I'm following up our Friday afternoon phone call about the position of Mr. Nelms on the production of documents pertaining to MGMCM, LP and Q Consolidated, Inc. that had accounts with Bank of Texas. As we discussed, Herman Hofman provided me with case authority that Federal Rules of Procedure would take precedence over the Texas Right to Financial Privacy.

I look forward to hearing from you and appreciate your courtesy in this matter. Take care.

John D. Clayman

Admitted in Oklahoma and Texas

FREDERIC DORWART, LAWYERS PLLC

Old City Hall

124 East Fourth Street

Tulsa, Oklahoma 74103

(918) 583-9965 (Direct Tel. No.)

(918) 583-9922 (General Office No.)

(918) 584-2729 (Facsimile No.)

(918) 606-2974 (Mobile No.)

jclayman@fdlaw.com

Legal Assistant: Candace Caywood, ccaywood@fdlaw.com

FREDERIC DORWART

LAWYERS PLLC

This message contains confidential information and is intended only for the individual(s) named. If you are not the named addressee, you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this e-mail by mistake and delete this e-mail from your system. E-mail transmission cannot be guaranteed to be secure or error-free as information could be intercepted, corrupted, lost, destroyed, arrive late or incomplete, or contain viruses.

From: Clayman, John
Sent: Wednesday, February 2, 2022 5:29 PM
To: hdhofman@varnumlaw.com
Cc: Caywood, Candace <CCaywood@fdlaw.com>; Simms, Amber <asimms@fdlaw.com>; eparzianello@hspplc.com; kmajewski@hspplc.com; sdenenfeld@lewisreedallen.com; Clayman, John <JClayman@fdlaw.com>
Subject: BOKF/Ortiz v. Nelms (123.001) - Response to Subpoena

Good evening Mr. Hofman:

Please see the attached. Thank you. Best regards.

John D. Clayman
Admitted in Oklahoma and Texas
FREDERIC DORWART, LAWYERS PLLC
Old City Hall
124 East Fourth Street
Tulsa, Oklahoma 74103
(918) 583-9965 (Direct Tel. No.)
(918) 583-9922 (General Office No.)
(918) 584-2729 (Facsimile No.)
(918) 606-2974 (Mobile No.)
jclayman@fdlaw.com
Legal Assistant: Candace Caywood, ccaywood@fdlaw.com

FREDERIC DORWART
LAWYERS PLLC

This message contains confidential information and is intended only for the individual(s) named. If you are not the named addressee, you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this e-mail by mistake and delete this e-mail from your system. E-mail transmission cannot be guaranteed to be secure or error-free as information could be intercepted, corrupted, lost, destroyed, arrive late or incomplete, or contain viruses.